

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA,	§	
	§	
	§	
V.	§	CRIM. NO. 3:21-CR-00236-E (02)
	§	
	§	
JOSEPH EVENTINO DELEON.	§	

UNOPPOSED MOTION TO AMEND CONDITIONS OF RELEASE

TO THE HONORABLE ADA BROWN
UNITED STATES DISTRICT JUDGE
NORTHERN DISTRICT OF TEXAS

COMES NOW, Joseph Eventino DeLeon, Defendant in the above styled case, and this this UNOPPOSED MOTION TO AMEND CONDITIONS OF RELEASE and would show this Court as follows:

I.

On December 29, 2021, Defendant appeared before United States Magistrate Judge Rutherford and received his conditions of release (Doc. 34). Defendant is 62 years old. At the time of the initial appearance and arraignment, neither undersigned counsel, nor Defendant, noticed that one of the conditions was that Defendant “continue or actively seek employment.” *See* Cond. (7)(b). This is a condition we see the most cases, however, in this case, Defendant is not only retired, but disabled and cannot work. Undersigned counsel has shared with the government Defendant’s medical records substantiating his disability. His medical condition was also discussed in the

pretrial services report. After reviewing the records, the government stated that it has no objection to this motion.

WHEREFORE, PREMISES CONSIDERED, Defendant prays that his conditions of release will be amended to delete condition (7)(b), that he “continue or actively seek employment.”

Respectfully submitted,

Westfall Sellers

By: /s/ Greg Westfall
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CERTIFICATE OF CONFERENCE

On the 24th day of January, 2022, undersigned counsel conferred with AUSA Marcus Busch about the substance of this motion. The government does not object to this Court granting this motion.

s/Greg Westfall

Greg Westfall

CERTIFICATE OF SERVICE

On this 2nd day of February, 2022, this motion was filed with the CM/ECF system. As a result, the government was served with a copy of this motion.

s/Greg Westfall

Greg Westfall